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March 6, 2023

The Honorable Colm F. Connolly
United States District Court
for the District of Delaware
844 North King Street
Wilmington, DE 19801

VIA ELECTRONIC FILING

Re: *Graco, Inc. v. Carlisle Construction Materials, LLC*,
C.A. No. 21-245-CFC

Dear Chief Judge Connolly:

The parties are attaching an amended claim construction chart that reflects Defendant Carlisle Construction Materials, LLC's current proposed construction for "connection block." Carlisle's amended construction for the "connection block" term was inadvertently not reflected in the Amended Claim Construction Chart submitted to the Court at D.I. 78. As an attachment hereto, Carlisle is providing a redlined version of the parties' Amended Claim Construction Chart which reflects the amended construction briefed by the parties.

Carlisle provided its amended construction as a response to Graco's amended position in its opening brief, as indicated in footnote 10 on page 64 of the parties' joint brief. Accordingly, Graco had the opportunity to respond to Carlisle's construction, and this construction was discussed in three of the four briefs exchanged by the parties.

The chart below reflects the amended construction, which narrowed the disputed issues between the parties as to this term:

The Honorable Colm F. Connolly

March 6, 2023

Page 2

Term	Plaintiffs' Proposed Construction	Plaintiffs' Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
<p>“a connection block for each of the plural components”</p> <p>“each connection block”</p> <p>(claim 1)</p>	<p>Plain and ordinary meaning: “More than one connection block, each providing means for connecting a supply of one of the plural components with the mixing chamber.”</p>	<p>The '172 patent's specification and file history, including in particular:</p> <p>'172 patent at 4:20-46; 6:22-51; Figs. 1-2, 12; Claims 1-15.</p> <p>Evidence cited by Carlisle.</p>	<p>“More than one connection block, each block being separate and <u>connecting to only one of the plural components and providing means for connecting a supply of one of the plural components with the mixing chamber.</u>”¹</p>	<p>The '172 patent's specification and file history, including in particular:</p> <p><i>See Abstract, 1:63-2:5, 2:10-27, 3:49-50, 4:30-46, 6:22-31; Figs. 1-2.</i></p> <p><i>See also '172 Patent File History at 2009-01-13 Reasons for Allowance.</i></p> <p>Evidence cited by Graco.</p>

¹ To further clarify and narrow the dispute and address Graco's modified construction (Footnote 9 of Joint Brief), Carlisle modified the portion of its proposed construction that relates to the connection of the connection block to the supply of plural components. Carlisle modified its construction in its response brief, as reflected in footnote 10 on page 64 of the parties' joint brief. Both parties addressed this modified construction in their briefing.

The Honorable Colm F. Connolly

March 6, 2023

Page 3

Counsel for Carlisle has notified counsel for Graco regarding this submission. Counsel for Graco has indicated it has no objection.

Respectfully,

/s/ Anthony D. Raucci

Anthony D. Raucci (#5948)

cc: All Counsel of Record (via cm/ecf and email)